Applicant: Henry A. Hill Attorney's Docket No.: 09712-251003 / Z-462

Serial No.: 10/603,116 Filed: June 24, 2003

Page : 5 of 6

REMARKS

Claims 1-18 are canceled.

Claims 19-36 are pending. Claims 19-25 are allowed. Claim 36 is a new dependent claim.

Claims 26-35 stand rejected over U.S. Patent 5,363,196 ("Cameron"). We respectively disagree.

We submit that Cameron does not teach or suggest "for each position, measuring a direction of the reflected beam," as recited in independent claim 26 (emphasis added.) To the contrary, Cameron describes measuring a relative optical path (e.g., 222, 224, and 226) for a reflected beam corresponding to each of three interferometers (e.g., interferometers 208, 210, and 212) on each of the X and Y mirror surfaces of the wafer stage (see, col. 4, lines 36-46.)

Moreover, Cameron recommends that these interferometers are "conventional heterodyne double doppler type interferometers or homodyne fringe counting interferometers" (see, col. 4, lines 46-49), which means that the beam reflects from the mirror surface twice before being measured. As a result, the *direction* of the measured reflected beam *does not change* even when the beam contacts the mirror surface at non-normal incidence. Therefore, there is no reason for Cameron to measure the direction of the reflected beam, as recited in claim 26.

The rejected claims that remain depend from independent claim 26, and distinguish Cameron for at least the same reasons.

Accordingly, we ask that the application be allowed.

Applicant: Henry A. Hill Attorney's Docket No.: 09712-251003 / Z-462

Serial No.: 10/603,116 Filed: June 24, 2003

Page : 6 of 6

Please apply any charges or make any credits to deposit account 06-1050.

Respectfully submitted,

Date: (0 (76 /0 4

Marc M. Wefers* for David L. Feigenbaum Reg. No. 30,378

Fish & Richardson P.C. 225 Franklin Street Boston, MA 02110-2804

Telephone: (617) 542-5070 Facsimile: (617) 542-8906

20962840.doc

^{*}See attached document certifying that Marc M. Wefers has limited recognition to practice before the U.S. Patent and Trademark Office under 37 C.F.R. § 10.9(b).